

February 9, 2010

## VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, DC 20554

RE: EB Docket No. 06-36 -CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Blossom Telephone Company, Inc. and Blossom Telephone Company's long distance operation, please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 343-2544.

Sincerely.

Jean Langkop

Authorized Representative of Blossom Telephone Company, Inc.

JL/pjf

Attachments

cc: Best Copy and Printing, Inc (via email FCC@BCPIWEB.COM)

Ms. Joyce Dorries, Blossom Telephone Company, Inc.

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

Date: February 8, 2010

Name of company covered by this certification: Blossom Telephone Company, Inc. and Blossom Telephone Company, Inc.'s (long distance operation)

Form 499 Filer ID:

803469

Name of signatory:

Joyce Dorries

Title of signatory:

Secretary

I, Joyce Dorries, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et sea.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. The company is not aware of any attempts by pretexters to access the CPNI of company customers and therefore, has not had to take any actions against data brokers.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Attachment: Accompanying Statement

## ACCOMPANYING STATEMENT

To the best of my knowledge, Blossom Telephone Company, Inc. and Blossom Telephone Company, Inc.'s (long distance operation) ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

To the best of my knowledge and belief, the Company does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the required notification will be provided to customers, approval obtained as required, and appropriate safeguards for the use of CPNI will be implemented in accordance with 47 C.F.R. §64.2009.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F. R. §64.2010, including, but not limited to the following: CPNI is not disclosed unless the customer is properly authenticated. Although passwords are not used for authentication, call detail information is not discussed with a customer on a customer-initiated call unless the customer has sufficient details about the call(s) in question to address the customer service issue. If the customer is unable to provide sufficient information about the call in question, call detail information is shared only by (1) calling the customer back at the telephone number of record; or (2) mailing the information to the address of record; or (3) the customer coming to the office with a valid photo I.D. matching the name on the customer's account. Currently, the Company's customers do not have online access to their accounts. If this changes in the future, the Company will implement authentication procedures for online access to CPNI in accordance with § 64.2010(c) and (e). The Company has implemented procedures to immediately notify a customer whenever an address of record is created or changed. It is the Company's policy to call the customer back at the telephone number of record. If the customer cannot be reached, either by talking to the customer or leaving a recorded message, a letter will be mailed to the customer's old address of record within 24 hours of receiving the order, notifying the customer that a change has been made.

The Company has a written CPNI policy that explains what CPNI is, when it may be used without customer approval, and when customer approval is required prior to CPNI being used, disclosed or accessed for marketing purposes. The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are

Blossom Telephone Company, Inc. and Blossom Telephone Company, Inc. (long distance operation)

prohibited from using, disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. In accordance with the Company's disciplinary policy, any employee that uses, discloses, or permits access to CPNI in violation of Federal regulations is subject to disciplinary action, and possible termination.